

FILED 13 DEC '22 16:47 USDC-ORP

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

UNITED STATES OF AMERICA

3:22-cr-432-SI

v.

INDICTMENT

JOHN DOE # 1,
a.k.a. "John Miller,"
and
MATTHEW GREER BENZ,

21 U.S.C. §§ 841(a)(1), 841(b)(1)(C),
841(b)(2), 843(b), and 846

18 U.S.C. § 924(c)

Defendants.

Forfeiture Allegation

THE GRAND JURY CHARGES:

COUNT 1

(Conspiracy to Distribute and Possess with Intent to
Distribute Controlled Substances)
(21 U.S.C. §§ 841(a)(1), 841(b)(1)(C), 841(b)(2), and 846)

Beginning on or about a date at the beginning of 2022, the exact date being unknown to the Grand Jury, and continuing through on or about August 22, 2022, within the District of Oregon and elsewhere, defendants **JOHN DOE # 1, a.k.a. "John Miller,"** and **MATTHEW GREER** did knowingly and intentionally combine, conspire, confederate, and agree with each other and with others both known and unknown to the Grand Jury, to carry out the following objects in furtherance of the conspiracy:

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Indictment

Objects of the Conspiracy

The conspirators did knowingly and intentionally combine, conspire, confederate, and agree to distribute and possess with the intent to distribute pills and tablets containing various Schedule II and Schedule IV controlled substances, to include:

1. Tapentadol, a Schedule II controlled substance;
2. Lorazepam, a Schedule IV controlled substance;
3. Alprazolam, a Schedule IV controlled substance;
4. Clonazepam, a Schedule IV controlled substance;
5. Diazepam, a Schedule IV controlled substance;
6. Carisoprodol, a Schedule IV controlled substance;
7. Modafinil, a Schedule IV controlled substance; and,
8. Tramadol, a Schedule IV controlled substance,

in violation of Title 21, United States Code, Section 841(a)(1), 841(b)(1)(C), and 841(b)(2).

Manner and Means of the Conspiracy

The defendants, and others known and unknown to the grand jury, were members of an international drug distribution organization operating under the guise of a purported on-line pharmacy that was involved in illegally distributing and possessing with the intent to distribute hundreds of thousands of pills and tablets containing various Schedule II and Schedule IV controlled substances that were being mailed into and throughout the United States for purposes of further distribution, including within the District of Oregon. The manner and means used to accomplish the objectives of the conspiracy included, among others, the following:

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1. Defendant **JOHN DOE # 1, a.k.a. "John Miller,"** acting as an organizer, leader, manager, and supervisor of an international Internet based drug distribution organization, operating under the name "Pharmacy Dropshipping," would arrange, coordinate, and mail packages that contained hundreds of thousands of pills and tablets of various controlled substances, to include Tapentadol, Lorazepam, Alprazolam, Clonazepam, Diazepam, Carisoprodol, Modafinil, and Tramadol into the United States and the District of Oregon, for purposes of further distribution.

2. Defendant **MATTHEW GREER BENZ** would, operating within the District of Oregon as a "reshipper," receive, transport, store, repackage, conceal, possess with the intent to distribute, and distribute pills and tablets containing various controlled substances, to include Tapentadol, Lorazepam, Alprazolam, Clonazepam, Diazepam, Carisoprodol, Modafinil, and Tramadol to various customers throughout the United States, to include the District of Oregon, for purposes of further distribution.

3. Defendants **JOHN DOE # 1, a.k.a. "John Miller,"** and **MATTHEW GREER BENZ** would, in furtherance of the conspiracy, utilize encrypted messenger applications, cellular telephones, Facebook Messenger, and text messaging services to commit, cause, and facilitate the distribution and possession with the intent to distribute pills and tablets containing various controlled substances to include Tapentadol, Lorazepam, Alprazolam, Clonazepam, Diazepam, Carisoprodol, Modafinil, and Tramadol.

4. Defendant **MATTHEW GREER BENZ** would, in furtherance of the conspiracy, maintain premises/locations in Oregon for the purposes of storing, packaging, possessing with the intent to distribute, and distributing pills and tablets containing controlled substances to

include Tapentadol, Lorazepam, Alprazolam, Clonazepam, Diazepam, Carisoprodol, Modafinil, and Tramadol.

5. Defendant **MATTHEW GREER BENZ** would, in furtherance of the conspiracy, utilize various addresses in and around Portland, Oregon to receive packages of pills and tablets containing controlled substances, to include Tapentadol, Lorazepam, Alprazolam, Clonazepam, Diazepam, Carisoprodol, Modafinil, and Tramadol, for purposes of further distribution.

6. Defendant **MATTHEW GREER BENZ** would, in furtherance of the conspiracy, utilize Bitcoin to receive payments for distributing and possessing with the intent to distribute pills and tablets containing controlled substances, to include Tapentadol, Lorazepam, Alprazolam, Clonazepam, Diazepam, Carisoprodol, Modafinil, and Tramadol.

7. Defendant **MATTHEW GREER BENZ** would, in furtherance of the conspiracy, sell pills and tablets containing various controlled substances to other individuals, known and unknown to the Grand Jury, for purposes of further distribution.

Overt Acts

In furtherance of this conspiracy, and to effect and accomplish its objectives, the defendants and other co-conspirators committed one or more of the following overt acts:

1. Beginning on or about a date at the beginning of 2022, the exact date being unknown to the Grand Jury, and continuing through August 22, 2022, defendant **JOHN DOE # 1, a.k.a. "John Miller,"** organized, led, managed, supervised, and ran an international drug trafficking organization in which, utilizing international shipping companies and various communication messenger services, he coordinated the distribution and possession with the intent to distribute pills and tablets containing controlled substances, to include Tapentadol,

Lorazepam, Alprazolam, Clonazepam, Diazepam, Carisoprodol, Modafinil, and Tramadol into and throughout the United State, to include the District of Oregon.

2. Beginning on or about a date in 2022, the exact date being unknown, and continuing through August 22, 2022, defendant **MATTHEW GREER BENZ** would, operating within the District of Oregon, receive, transport, store, repack, conceal, possess with the intent to distribute, and then distribute pills and tablets containing controlled substances, to include Tapentadol, Lorazepam, Alprazolam, Clonazepam, Diazepam, Carisoprodol, Modafinil, and Tramadol.

3. Beginning on or about a date in 2022, the exact date being unknown, and continuing through August 22, 2022, defendant **MATTHEW GREER BENZ** maintained premises/locations for the purpose of receiving pills and tablets containing controlled substances for purposes of further distribution.

4. Beginning on or about a date in 2022, the exact date being unknown, and continuing through August 22, 2022, defendant **MATTHEW GREER BENZ** possessed a firearm, to-wit: a Masterpiece Arms Mac 11 9mm pistol, in connection and in furtherance of the distribution and possession with intent to distribute pills and tablets containing various controlled substances.

5. Beginning on or about a date in 2022, the exact date being unknown, and continuing through August 22, 2022, defendants **JOHN DOE # 1, a.k.a. "John Miller,"** and **MATTHEW GREER BENZ** used communication facilities, to-wit: cellular telephones, to communicate with their sources of supply, customers, and co-conspirators in committing,

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causing, and facilitating their distribution and possession with intent to distribute pills and tablets containing controlled substances.

6. On or about August 22, 2022, within the District of Oregon, defendant **MATTHEW GREER BENZ** possessed for the purposes of further distribution thousands of pills and tablets containing various controlled substances, to include: approximately 6.7 kilograms of Tapentadol, a Schedule II controlled substance; approximately 1.5 kilograms of Lorazepam, a Schedule IV controlled substance; approximately 1.6 kilograms of Alprazolam, a Schedule IV controlled substance; approximately 896 grams of Clonazepam, a Schedule IV controlled substance; approximately 2.3 kilograms of Diazepam, a Schedule IV controlled substance; approximately 91 grams of Carisoprodol, a Schedule IV controlled substance; approximately 34 grams of Modafinil, a Schedule IV controlled substance; and, approximately 6 kilograms of Tramadol, a Schedule IV controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C), 841(b)(2), and 846.

COUNT 2
(Possession with the Intent to Distribute Tapentadol)
(21 U.S.C. § 841(a)(1) and 841(b)(1)(C))

On or about August 22, 2022, within the District of Oregon, defendant **MATTHEW GREER BENZ** did knowingly and intentionally possess with the intent to distribute Tapentadol, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

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COUNT 3

**(Possession with the Intent to Distribute Schedule IV Controlled Substances)
(21 U.S.C. § 841(a)(1) and 841(b)(2))**

On or about August 22, 2022, within the District of Oregon, defendant **MATTHEW**

GREER BENZ did knowingly and intentionally possess with the intent to distribute:

1. Lorazepam, a Schedule IV controlled substance;
2. Alprazolam, a Schedule IV controlled substance;
3. Clonazepam, a Schedule IV controlled substance;
4. Diazepam, a Schedule IV controlled substance;
5. Carisoprodol, a Schedule IV controlled substance;
6. Modafinil, a Schedule IV controlled substance; and,
7. Tramadol, a Schedule IV controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(2).

COUNT 4

**(Possession with the Intent to Distribute Fentanyl)
(21 U.S.C. § 841(a)(1) and 841(b)(1)(C))**

On or about August 22, 2022, within the District of Oregon, defendant **MATTHEW**

GREER BENZ did knowingly and intentionally possess with the intent to distribute a mixture or substance containing a detectable amount of fentanyl (N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propenamide), a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

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COUNT 5
(Possession of a Firearm in Furtherance of a Drug Trafficking Crime)
(18 U.S.C. § 924(c)(1)(A)(i))

On or about August 22, 2022, within the District of Oregon, defendant **MATTHEW GREER BENZ**, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, Conspiracy to Distribute and Possess with the Intent to Distribute a Controlled Substance and Possession with the Intent to Distribute a Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 846, as set forth in Counts 1, 2, 3, and 4, did knowingly possess the following firearm, to-wit: a Masterpiece Arms Mac 11 9mm pistol;

In violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

COUNT 6
(Use of Communication Facility to Facilitate a Drug Offense)
(21 U.S.C. § 843(b))

Beginning on or about the beginning of 2022, the exact date being unknown to the grand jury, and continuing through on or about August 22, 2022, within the District of Oregon and elsewhere, defendants **JOHN DOE # 1, a.k.a. "John Miller,"** and **MATTHEW GREER BENZ** knowingly and intentionally used a communication facility, to-wit: a cellular telephone, in committing, causing, and facilitating the commission of a felony drug offense, to-wit: a conspiracy to distribute and possess with the intent to distribute a controlled substance, as set forth in Count 1 of this Indictment;

In violation of Title 21, United States Code, Section 843(b).

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FIRST FORFEITURE ALLEGATION
(Controlled Substance Offenses)

Upon conviction of an offense in Counts 1 through 4, and/or 6, defendants **JOHN DOE # 1, a.k.a. "John Miller,"** and **MATTHEW GREER BENZ** shall forfeit to the United States, pursuant to 21 U.S.C. § 853, any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of the aforesaid violations and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of said violations.

SECOND FORFEITURE ALLEGATION
(Firearm Offense)

Upon conviction of the offense in Count 5, **MATTHEW GREER BENZ** defendant shall forfeit to the United States pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c), the firearm and ammunition involved in that offense, including without limitation: a Masterpiece Arms Mac 11 9mm pistol and the associated ammunition.

Dated: December 13th, 2022.

A TRUE BILL.


OFFICIATING FOREPERSON

Presented by:

NATALIE K. WIGHT
United States Attorney


SCOTT M. KERIN, OSB # 965128
Assistant United States Attorney